

# EXHIBIT H

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March 7, 2025

**VIA MDL CENTRALITY, CERTIFIED MAIL, AND EMAIL**

Re: MDL 3084 – Order re Withdrawal of Counsel in Case No. 3:24-CV-06948-CRB, MDLC ID 2585

Dear B.S.,

We write on behalf of our client, Uber Technologies Inc. (“Uber”), regarding *B.S. v. Uber Technologies, Inc., et al.*, 3:24-CV-06948-CRB, MDLC ID 2585, which you filed in *In re Uber Technologies, Inc. Passenger Sexual Assault Litigation*, 3:23-md-03084-CRB (“the MDL”). On January 21, 2025, Pulaski Kherkher, PLLC moved to withdraw its representation of you on the grounds that you have “failed to respond to Counsel’s numerous communication attempts via telephone, email, and text.” *B.S.*, No. 3:24-CV-06948-CRB, ECF 5 at 1 (Exhibit 1). On March 3, 2025, the Court granted that motion. *B.S.*, No. 3:24-CV-06948-CRB, ECF 6 at 1 (Exhibit 2). It is our understanding that you have not found replacement counsel and are no longer represented by an attorney. If that understanding is incorrect, please provide this communication to your attorney, and have your attorney contact us via the information provided above or below as soon as possible.

The Court’s Order states that “Within 28 days of this order, [the] plaintiff shall file a notice indicating whether they intend to pursue the action with new counsel or representing themselves. If [the] plaintiff does not file that notice, the Court will dismiss their case without prejudice.” Exhibit 2 at 1. The Court also ordered Uber’s counsel to “provide a copy of this order to the plaintiff[.]” *Id.* The Court’s Order is attached to this correspondence as Exhibit 2. Per this Order, you must “file a notice indicating whether [you] intend to pursue the action with new counsel or representing [yourself]” within 28 days of March 3, 2025, i.e. by Monday, March 31, 2025, or else “the Court will dismiss [your] case without prejudice.”

We ask that you please email us confirmation of your receipt of this letter, via email to [ksmith@paulweiss.com](mailto:ksmith@paulweiss.com), [lmurray@paulweiss.com](mailto:lmurray@paulweiss.com), and [ldugre@paulweiss.com](mailto:ldugre@paulweiss.com), at your earliest opportunity. If you would like to discuss the letter’s contents further, please let us know, and we would be happy to organize a meet and confer.

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

B.S.

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Sincerely,

**PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP**

By: /s/ Kyle Smith

Kyle Smith  
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# EXHIBIT 1

D. Douglas Grubbs (*Admitted PHV*)  
Adam K. Pulaski (*Admitted PHV*)  
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*Counsel for Plaintiff*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

This Document Relates to:

*B.S. vs. Uber Technologies, Inc., et al; 3:24-cv-06948*

**MOTION TO WITHDRAW AS COUNSEL  
OF RECORD**

Pursuant to Local Rule 11-5, D. Douglas Grubbs of Pulaski Kherkher, PLLC, counsel of record for Plaintiff B.S. (“Counsel”), respectfully moves this Court for an Order allowing his firm to withdraw as counsel of record in the above-captioned matter.

Over the past several months, Plaintiff B.S. has failed to respond to Counsel’s numerous communication attempts via telephone, email, and text. Counsel has made no less than fifty communication attempts to Plaintiff since filing her Short Form Complaint in early October 2024. On January 10, 2025, Counsel advised Plaintiff in writing of their intent to withdraw from this matter via electronic mail if she did not respond by January 21, 2025. Counsel finally spoke with Plaintiff on January 16 by phone, but the call disconnected, and Plaintiff has not replied to Counsel’s follow-up attempts. Counsel advised Defendants of their intent to withdraw from this

1 matter during a meet and confer conference on December 23, 2024 regarding Magistrate  
2 Cisneros' fact sheet deadline.

3 WHEREFORE, the law firm of Pulaski Kherkher, PLLC; and all attorneys of record for  
4 Plaintiff request that they be allowed to withdraw as counsel of record for Plaintiff B.S. A copy  
5 of this motion will be served upon Plaintiff at her last known address and via electronic mail.  
6

7 Dated: January 21, 2025

Respectfully submitted,

8  
9 **PULASKI KHERKHER, PLLC**

10 /s/ D. Douglas Grubbs

D. Douglas Grubbs (TX Bar No. 24065339)

(Admitted Pro Hac Vice)

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17 Counsel for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on January 21, 2025, I electronically transmitted the foregoing MOTION TO WITHDRAW AS COUNSEL OF RECORD to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the foregoing was served on Defendants' counsel via email at: [MDL3084-service-Uber@paulweiss.com](mailto:MDL3084-service-Uber@paulweiss.com).

/s/ D. Douglas Grubbs  
D. Douglas Grubbs

# EXHIBIT 2



IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

MDL No. 3084

This Order Relates To:

*See Attachment*

**ORDER GRANTING MOTIONS TO  
WITHDRAW**

Re: Dkt. Nos. 2109, 2110, 2112, 2173,  
2175, 2176, 2178, 2179, 2180

The above captioned motions to withdraw are granted. Within 28 days of this order, each plaintiff shall file a notice indicating whether they intend to pursue the action with new counsel or representing themselves. If any plaintiff does not file that notice, the Court will dismiss their case without prejudice.

Uber's counsel shall provide a copy of this order to the plaintiffs and file a declaration within 7 days of this ruling explaining how they did so.

**IT IS SO ORDERED.**

Dated: March 3, 2025



CHARLES R. BREYER  
United States District Judge

**ATTACHMENT**

This Order relates to:

S.H. v. Uber, Inc.,  
Case No. 3:24-cv-07156-CRB

B.S. v. Uber, Inc.,  
Case No. 3:24-cv-06948-CRB

C.S. v. Uber, Inc.,  
Case No. 3:24-cv-06923-CRB

Jane Doe EB 22 v. Uber, Inc.,  
Case No. 3:24-cv-05245-CRB

Naccarato v. Uber, Inc.,  
Case No. 3:24-cv-05312-CRB

Jane Doe EB 19 v. Uber, Inc.,  
Case No. 3:24-cv-05217-CRB

Jane Doe EB 10 v. Uber, Inc.,  
Case No. 3:24-cv-05197-CRB

K.B. v. Uber, Inc.,  
Case No. 3:24-cv-05719-CRB

D.M.S. v. Uber, Inc.,  
Case No. 3:24-cv-05606-CRB